

San Lucas Ranch

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Rich Raines
Bureau of Reclamation, Technical Service Center
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Dear Mr. Raines:

This letter constitutes our comments on the Aug 31, 1998 Draft Environmental Assessment for the Bradbury Dam-Spillway Modification-Hilton Creek Water Supply Line Project.

We would first like to point out that the scope of the assessment chosen for this project is wholly inadequate. To say that the introduction of a permanent supply of water to Hilton Creek which flows into the Santa Ynez River which, in turn, flows into the Pacific Ocean has no impact on anything other than Bureau of Reclamation property is, simply, not accurate. Potentially, all properties downstream of Hilton Creek could be affected by this project. Since the scope of this assessment is limited to Bureau property, and doesn't even consider neighboring properties, it clearly does not meet the requirements of an environmental assessment. You should be aware that there are already negative impacts occurring downstream as a result of the introduction of water to the Santa Ynez River at times when it did not naturally or historically occur. Such impacts range in nature from introduction of previously unknown, non-native plant species, abnormal growth of vegetation which has resulted in at least one known car accident at Hwy 154 and Lower Armour Ranch Rd, to creation of an attractive public nuisance. These are serious issues, which need to be addressed.

As immediate neighbors downstream of this project, as owners of the upper reaches of Hilton Creek and as owners of Cachuma Village, who have been here since 1924, we feel rather well qualified to discuss the environmental impacts of this project, particularly from an historical perspective. We have specific concerns about contradictions in this report and also some obvious inaccuracies.

According to NMFS March 10, 1997 conference letter, the construction of this project was to occur during the dry season, yet on page 9 of the EA it states that "work would be initiated around October 15, 1998 and would continue approximately 90 days". That is certainly not the

dry season and doesn't leave much time for consideration of comments to the EA. Another apparent contradiction is the different amounts of water to be put annually in the Fish Reserve Account. It has, until this EA, been stated publicly that the Fish Reserve Account would have 2000 ac-ft per year in it. On page 4, it is stated that there would be 3000 ac-ft in years when the reservoir spills. How did this occur? Water entitlements for other users of this source do not fluctuate up and down according to the amount of water available. How, then, can the Fish account receive more water entitlement than the other users of this system? This is not justifiable in the face of an ever-increasing demand for a limited resource. We don't believe that if the general public was aware of the potential effects of this program, that they would be in favor of it either.

Our comments regarding the inaccuracies in this EA have to do with the statement made regarding Visual Resources, Land Use, Air Quality, Noise Surface Water, Groundwater, Vegetation, Wildlife, and Fishery Resources. It is stated in the Comparison of Environmental Effects Associated with Implementing the Preferred Alternative that in each of these categories there will be "no change from the No Action Alternative" which says there will be "no change from existing environment". This simply is not true and does not even reflect the severe changes that have already occurred downstream of this project. Our points are as follows:

- Visual Resources- due to year-round water artificially introduced into the Santa Ynez River system for the past several years, there has been introduction of never before seen plant species that spread rapidly along the river, algae is encouraged to grow in abnormal amounts and trees have grown at abnormal rates blocking sight distances for vehicles travelling across Hwy 154 bridge at the River.
- Land Use- due to year-round water artificially introduced into the Santa Ynez River, we are having difficulty accessing our property known as the 1000 acres which is directly across the River from the main ranch- due to greatly increased amounts of algae on the rocks in the River, it has become exceedingly dangerous for cowboys, horses and cattle, including small calves to cross our river property to the pasture on the other side which we must do several times a year. Until the artificial introduction of water, this was not a problem.
- Air Quality- Cachuma Village and other residences on San Lucas Ranch have already been impacted by noise and dirt of construction activities at Bradbury Dam for the past year and a half. The Bureau of Reclamation is no longer a quiet neighbor. This project will continue to degrade our lives. Using water, a limited resource, to accomplish better air quality is foolhardy and paving will forever change the character of the area to something urban with easy access. This is unacceptable to us.
- Noise- see Air Quality.
- Surface Water- due to year-round water artificially introduced into the Santa Ynez River, and because the nature of rivers is to flow somewhere, naturally there will be an impact outside of the project area. Already my employees and I, and the Sheriff's department have spent an inordinate amount of time pursuing fishing-trespassers in the Santa Ynez River. We are grateful to California Department of Fish and Game for finally seeing reason and closing the River to fishing although they have yet to set signs stating that. However, during hot summer months, when normally there are only isolated pools of water and not a live stream, existence of surface water has and will continue to create an "attractive public nuisance"-a serious liability for this project.
- Groundwater- due to year-round water artificially introduced into the Santa Ynez River, the nature of the groundwater has naturally changed. Since there has, according to this EA, been no water quality sampling done on the reservoir, and antiquated assumptions that high TDS

